

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 4:18-cr-20812-MFL-SDD

-VS-

Judge: HON. MATTHEW F. LEITMAN

D-3 CAROL ALMERANTI,

Defendant.

DEFENDANT'S AMENDED EX-PARTE PETITION TO PERMIT SPECIFIC TRAVEL

NOW COMES Defendant CAROL ALMERANTI by and through her attorneys HELMKAMP, ELLIS, ABRAHAM & ENGERER, and for her Amended Ex-Parte Petition to Permit Specific Travel states:

1. On May 22, 2019 Defendant CAROL ALMERANTI entered a plea.
2. Ms. Almeranti desires to briefly travel outside of the country to Mexico from January 12 to January 19, 2022 for a family vacation with her sisters.
3. Sentencing is currently scheduled for after her return and is likely to be postponed again.
4. Defendant has been fully cooperative at every stage of proceedings and continues to assist the Department of Justice in its ongoing investigation.
5. Defendant's Pre-trial Officer does not object to the requested travel **(EXHIBIT 1)**.
6. The Government defers to Pre-Trial Services and the Court **(EXHIBIT 2)**.

WHEREFORE, Defendant respectfully requests that this Honorable Court direct Pre-trial services to relinquish Defendant's passport

EXHIBIT 1

From: Brian_Harmon@miept.uscourts.gov,

To: headesq@aol.com,

Subject: RE: Carol Almeranti Petition to Permit Specific Travel

Date: Mon, Aug 16, 2021 1:35 pm

Attachments:

Okay. I am fine with the travel.

Brian Harmon

United States Pretrial Services Officer

Eastern District of Michigan

231 West Lafayette

Detroit, MI 48226



313-234-5319 (Phone)

313-202-5924 (Fax)

brian_harmon@miept.uscourts.gov

From: headesq@aol.com <headesq@aol.com>

Sent: Monday, August 16, 2021 1:34 PM

To: Brian Harmon <Brian_Harmon@miept.uscourts.gov>

Subject: Re: Carol Almeranti Petition to Permit Specific Travel

CAUTION - EXTERNAL:

Mexico only.

EXHIBIT 2

From: Mark.S.McDonald@usdoj.gov,

To: headesq@aol.com,

Subject: Re: Rosett, Miller, Almeranti (4:18-CR-20812)

Date: Thu, Jul 29, 2021 12:08 pm

Hello. Please run it by pretrial services. We will defer to them

Mark (Mac) McDonald

Trial Attorney

U.S. Department of Justice, Tax Division

Northern Criminal Enforcement Section

150 M Street N.E. - Room 1.1405

Washington, D.C. 20002

(202) 305-2672 [Office]

(703) 328-5779 [Cell]

From: headesq@aol.com <headesq@aol.com>

Date: July 29, 2021 at 12:03:40 EDT

To: McDonald, Mark S. (TAX) <Mark.S.McDonald@tax.USDOJ.gov>

Subject: Re: Rosett, Miller, Almeranti (4:18-CR-20812)

Hi Mac,

Ms. Almeranti requests permission to travel with her sisters January 12-19, 2022.

Can we stipulate to the attached order?

Doug

Douglas C. Abraham, Esq.

19500 Victor Parkway, Suite 150

Livonia, MI 48152

P: (734) 591-3737

F: (734) 591-6275

E: headesq@aol.com

-----Original Message-----

From: McDonald, Mark S. (TAX) <Mark.S.McDonald@usdoj.gov>

To: headesq@aol.com <headesq@aol.com>; Maurice Davis <maurice@michigancriminallawyer.com>; ben@goneklaw.com
Gonek <ben@goneklaw.com>

Sent: Fri, Apr 30, 2021 6:29 pm

Subject: Rosett, Miller, Almeranti (4:18-CR-20812); stipulation to continue sentencing to Jan 2022

Defense counsel –